

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

Lori Wright, as Next Friend and  
Parent of Destin Wright, Deceased,

Plaintiff,

v.

Civil Action  
File No. 4:15-cv-59-HLM

JOHNNY MOATS, Individually and  
in his Official Capacity as Polk  
County Sheriff;; J. KELLY  
MCLENDON, Individually and in his  
Official Capacity as Polk County  
Sheriff; POLK COUNTY, GEORGIA;  
SOUTHERN HEALTH PARTNERS,  
INC.; K. HEATH, LPN; SHANNON  
TURNER, LPN; J. THOMAS, LPN;  
and BETTY FOWLER, LPN, in their  
Individual Capacities; JOHN DOES I,  
II, and JANE DOES I, II, and III, in  
their Individual Capacities,

Defendants.

**RULE 5.4 CERTIFICATE OF SERVICE OF DISCOVERY MATERIALS**

Pursuant to Rule 5.4 of the Local Rules of the United States District Court  
for the Northern District of Georgia, I hereby certify that on August 8, 2016, I  
served upon all parties of record, via United States Postal Service, first class  
postage prepaid, copies of:

1. Defendant Betty Fowler, LPN's Responses and Objections to Plaintiff Teddy E. Wright's First Interrogatories;

2. Defendant Betty Fowler, LPN's Responses and Objections to Plaintiff Teddy E. Wright's First Request for Production of Documents;

3. Defendant Jayne Thomas' Responses and Objections to Plaintiff Teddy E. Wright's First Interrogatories;

4. Defendant Jayne Thomas' Responses and Objections to Plaintiff Teddy E. Wright's First Request for Production of Documents;

5. Defendant Shannon Turner, LPN's Responses and Objections to Plaintiff Teddy E. Wright's First Interrogatories;

6. Defendant Shannon Turner, LPN's Responses and Objections to Plaintiff Teddy E. Wright's First Request for Production of Documents;

7. Defendant Southern Health Partners, Inc.'s Defendant Responses and Objections to Plaintiff Teddy E. Wright's First Interrogatories;

8. Defendant Southern Health Partners, Inc.'s Responses and Objections to Plaintiff Teddy E. Wright's First Request for Production of Documents.

Respectfully submitted, this 8<sup>th</sup> day of August 2016.

Schreeder, Wheeler & Flint, LLP

/s/ Shira A. Crittendon

SHIRA A. CRITTENDON

Georgia Bar No. 005425

Attorney for Defendant

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**CERTIFICATE OF SERVICE**

This is to certify that I have this day served the foregoing RULE 5.4  
CERTIFICATE OF SERVICE OF DISCOVERY with the Clerk of the Court using  
the CM/ECF system, which will automatically send e-mail notification of such  
filing to all attorneys of record.

G. Kevin Morris  
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This the 8<sup>th</sup> day of August, 2016.

/s/ Shira A. Crittendon  
SHIRA A. CRITTENDON  
Georgia Bar No. 005425

Attorney for Defendant  
Southern Health Partners, Inc.